BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA
-oOo-

FILED
02-05-07
03:55 PM

Order Instituting Rulemaking to Consider the Adoption of a General Order and Procedures to Implement the Digital Infrastructure and Video Competition Act of 2006.	)	Rulemaking 06-10-005

OPENING COMMENTS OF VERIZON CALIFORNIA INC. (U 1002 C) ON PROPOSED DECISION OF COMMISSIONER CHONG

Elaine M. Duncan
711 Van Ness, Suite 300
San Francisco, CA 94102
415/474-0468
415/474-6546 (Fax)
elaine.duncan@verizon.com

February 5, 2007

Attorney for Verizon California Inc.

TABLE OF CONTENTS continued

TABLE OF CONTENTS con't

TABLE OF AUTHORITIES

Page

<u>Other</u>

Pursuant to Article 14 of the Commission's Rules, Verizon submits these opening comments on the Proposed Decision (PD) of Commissioner Chong. Consistent with the rules, Verizon's comments focus on errors of fact or law in the PD, and include a redlined attachment showing proposed changes to the findings of facts, conclusions of law and proposed General Order (GO) as well as its appendices.

I. INTRODUCTION AND SUMMARY

The PD represents the culmination of an exhaustive and thorough effort to develop an implementation mechanism that accurately reflects the letter and spirit of the Digital Infrastructure and Video Competition Act of 2006 (DIVCA). DIVCA provides extremely detailed guidance in many areas, allowing the Commission no flexibility to modify or expand its express provisions. The PD takes care to respect these limitations, as it must. In other areas, DIVCA is silent, leaving the Commission to act while adhering to its limited role and circumscribed jurisdiction. In general, the PD walks this line carefully, balancing competing interests in a way that honors the legislative intent and fulfills the Commission's mandate. These comments focus on the limited number of areas where the PD must be modified to closely adhere to DIVCA or where factual, legal or technical errors in the PD must be corrected.

Most significantly, these errors include an unlawful extension of broadband reporting obligations to other affiliates, in particular wireless affiliates, expressly prohibited by DIVCA. In an effort to maximize data collection, the PD goes far beyond the bounds of DIVCA to seek reporting of data from "any and all" affiliates, when its concerns can in fact be met in a much more narrowly tailored way. In addition, the PD misreads DIVCA to expand the scope of instances in which it is *required* to hold hearings. Those instances are few and carefully defined in DIVCA, and so the PD's analysis does not conform to DIVCA. However, nothing in the law prevents the Commission from using those procedural tools normally available to it, so long as they are exercised within the scope of authority conferred by DIVCA.

The PD also commits factual error in requiring an *executed* bond to be submitted with an application. As a matter of industry practice, financial institutions do not issue bonds to secure performance of an obligation until the obligation exists, and therefore an executed bond cannot be submitted until after an effective franchise is issued. This error is easily remedied as discussed below.

In addition, under DIVCA, aggregated video and broadband data remains subject to the provisions of Public Utilities Code § 583, under which parties have the right to an opportunity to support claims of confidentiality and obtain a decision of the full Commission. As competition emerges in the video services market, new entrants such as Verizon may be competitively harmed if their well-established cable competitors can easily track their service availability on a statewide basis. This is particularly true in the case of new entrants which, to the extent they are telephone companies, have distinct service territories that do not overlap with each other. The protection normally afforded by aggregation does not exist if data from only a handful of carriers is "aggregated." Finally, detailed changes are recommended with regard to several technical data issues.

II. ELIGIBILITY REQUIREMENTS

A. Requiring Wireless Affiliates to Report Broadband Data Violates DIVCA

In response to numerous comments, the PD eliminated its earlier proposal to require a corporate parent to apply for a statewide franchise, replacing it with a requirement that the applicant or its parent assume responsibility for complying with these provisions "on behalf of *any and all* of its California affiliates."[1] "Affiliate" is defined as any company five percent of which is under common ownership or control with the applicant.[2] This option was purportedly chosen as "the *most narrowly tailored means* of ensuring effective enforcement of . . . DIVCA provisions . . . regarding the cross-subsidization prohibition, build-out requirements, and reporting obligations.[3] However, this sweeping requirement is overbroad, unnecessary, and unlawful, violating both the plain language and legislative history of DIVCA. Specifically, it imposes broadband reporting obligations on *all* affiliates, including non-wireline affiliates such as Verizon Wireless[4] – a result clearly contrary to DIVCA.

Although Verizon believes that the enforcement concerns identified in the PD are largely if not completely unfounded,[5] we acknowledge the Commission's

---

[1] PD at 38 (emphasis added).
[2] Id. This definition derives from R.92-08-008, the Commission rulemaking which adopted interim reporting requirements of affiliate transactions between electric, gas, and telephone utilities and their subsidiaries, affiliates and controlling corporations
[3] PD at 35 (emphasis added); *see also* discussion, PD at 32-34.
[4] Verizon Wireless is a joint venture 55% owned by Verizon Communications Inc., the corporate parent of Verizon California Inc., thereby falling within the definition of "affiliate" in the PD.
[5] For example, the PD errs in concluding that an entity must have <u>both</u> telephone and video customers in order to be held to the build-out requirement of § 5890(b). PD at 33. Section 5890 (b) plainly applies to holders if "holders <u>or</u> their affiliates" have more than 1,000,000 telephone customers. Moreover, the "applicant <u>or</u> its affiliate" must agree to comply with § 5890, so it is unclear how this requirement could be evaded as the PD suggests. Likewise, with respect to cross-subsidization, the PD concedes that existing law "largely alleviates" enforcement concerns in this area, and since an "applicant <u>or</u> its affiliate" must likewise agree in any application to

concerns in this area and do not challenge those. However, for all the reasons set forth below, the broadband reporting obligation of DIVCA clearly cannot lawfully be applied to wireless affiliates such as Verizon Wireless.[6] Accordingly, although the reporting obligations cannot lawfully be applied to any affiliate, at a minimum, we recommend clarifying that any definition of "affiliate" be limited to "wireline" affiliates.

1. DIVCA Is Limited To Wireline Companies and Facilities

From its inception and throughout its history, DIVCA by its plain terms has been limited to *wireline*-based services, facilities and companies. The text is replete with examples of this limited focus:

- *"Video service*" is defined as service using facilities located in the public rights of way and expressly **excludes wireless** video[7]
- Non-wireline "direct-to-home satellite service" is expressly excluded from coverage of DIVCA[8]
- *"Franchise*" refers to the construction and operation of a network in the right-of-way, a reference to wireline facilities[9]
- *"Holder"* is a person or group of persons that has been issued a *franchise*[10]

---

comply with all federal and state statutes, rules, and regulations, it is also unclear why compliance with this section presents a concern. § 5840 (d)(1)(B). Given these provisions, in which certain sections of DIVCA already reach affiliates, the PD's approach is clearly not "narrowly tailored" to achieve effective enforcement of DIVCA.

[6] It should be pointed out, of course, that the cross-subsidy and non-discrimination obligations the Commission is concerned with enforcing do not implicate wireless service in any event. Wireless companies do not offer "stand-alone, residential, primary line, basic telephone service" service subject to the cross-subsidization prohibition of DIVCA (§ 5840), and the non-discrimination obligations apply to the availability of *wireline* services within the video service provider's wireline footprint (§ 5890(a), (k)), not to wireless services.

[7] Video service "does not include (1) any video programming provided by a commercial mobile service provider defined in Section 322(d) of Title 47 of the United States Code, or (2) video programming provided as part of, and via, a service that enables users to access content, information, electronic mail, or other services offered over the public Internet." § 5830(s).

[8] *See* § 5890 (j)(4)(satellite excluded as form of "access" to service); § 5890(d)(satellite service excluded).

[9] § 5830(f).

[10] § 5830(i).

- *"Network*" refers to facility components physically located in the public right-of-way[11]

- A key DIVCA goal regarding broadband services is framed *solely* in wireline terms, relying on the above definitions: to establish a "*franchise* authorization process that allows market participants to use their *networks* and systems to provide *video*, voice, and broadband services to all residents of the state."[12]

- "Cable operator," "cable service," and "cable system" are all defined with respect to Section 522 of Title 47 of the United States Code, which the FCC has unequivocally held to **exclude wireless** services[13]

- Provision of video service is not required outside a holder's telephone wireline footprint[14]

In short, DIVCA is solely focused on wireline-based services.[15]

2. A Broadband Reporting Obligation Directly Targeted At All Affiliates Including Wireless Was Eliminated Prior to Enactment And Cannot Be Resurrected

Beyond the DIVCA's exclusive focus on wireline facilities, services and carriers, the plain language of the broadband reporting provisions, § 5960 (b)(1), refers *only* to the "holder" and the broadband services *it* provides. More compelling, however, is the fact that a prior version of the bill contained broadband reporting obligations *targeted directly at wireless affiliates,* but all of

---

[11] § 5830(l).
[12] § 5810 (1)(C).
[13] *In the Matter of Definition of a Cable Television System*, MM Docket No. 89-35, 5 FCC Rcd 7638; 1990 FCC LEXIS 6694 (October 11, 1990), ¶¶7-10 (radio based video distribution systems are not "cable systems" as statutory definition of "cable system" contains a threshold requirement of facilities involving "closed transmission paths," defined as media having the capacity to transmit electromagnetic signals over a common transmission path such as coaxial cable, optical fiber, wire, waveguide, or other such signal conductor or device).
[14] § 5890 (k).
[15] The broadband reporting provisions do ask the holder to report whether its broadband services utilize "wireline-based or another technology," § 5960(b)(1)(C), but for the reasons explained here and below, this is simply a request for information, not a substantive obligation on non-wireline affiliates. Moreover, given the wireline focus of DIVCA, a far more reasonable interpretation of this request is that it refers to fixed (rather than mobile) wireless broadband facilities (e.g., Wi-Max) that might supplement wireline broadband.

those affiliate requirements were removed prior to passage, leaving reporting obligations *solely* on the holder. The comparison is shown in Exhibit 1.[16]

Fundamental principles of statutory construction dictate that a provision removed from an earlier version of a statute cannot be read into the final one. The United States Supreme Court made this point clear in *Doe v. Chao*, 540 U.S. 614, 623 (2004). That case considered whether a plaintiff in a Privacy Act action needed to show actual (as opposed to presumed) damages to qualify for an award. The Court concluded that a plaintiff did need to show actual damages, based in part on removal of language authorizing an award without such a showing. The Supreme Court observed:

> This inference … is underscored by drafting history showing that Congress cut out the very language in the bill that would have authorized any presumed damages. … The deletion of "general damages" from the bill is fairly seen, then, as a deliberate elimination of any possibility of imputing harm and awarding presumed damages. The deletion thus precludes any hope of a sound interpretation of entitlement to recovery without reference to actual damages. *Id.*

The Supreme Court reached the same conclusion in *Daily Income Fund v. Fox*, 464 U.S. 523, 539 (1984), which considered whether Section 36(b) of the Investment Company Act of 1940 created an implied private right of action for investment companies to sue their advisors for excess fees. The Court noted that an earlier version had created an *express* right of action, but had been

[16] Compare AB2987 as amended in Senate August 23, 2006, pp. 15-16, available at http://info.sen.ca.gov/pub/05-06/bill/asm/ab_2951-3000/ab_2987_bill_20060823_amended_sen.pdf, with § 5960(b)(1). For ease of comparison, a copy of the relevant provisions of the August 23, 2006 version is attached to these comments as Exhibit 1.

removed prior to passage. It concluded that this history showed that Congress did not create an implied private right of action. Specifically, the Court observed:

> In short, Congress rejected a proposal that would have expressly made the statutory standard governing adviser fees enforceable by the investment company itself and adopted in its place a provision containing none of the indications in earlier drafts that the company could bring such a suit. This legislative history strongly suggests that, in adopting § 36(b), Congress did not intend to create an implied right of action in favor of the investment company. *Id.*

This rule is consistent with long-standing California principles of statutory interpretation. [17]

In this case, omission of an affiliate broadband reporting obligation from a prior version of the bill is compelling evidence that the legislature did not intend such obligations to be imposed on affiliates, much less wireless affiliates whose services are nowhere implicated by the law. Therefore, the Commission *cannot* reimpose an affiliate broadband reporting requirement that the legislature expressly removed prior to enactment of DIVCA.

3. Collection of Wireless Broadband Data Is Inconsistent With DIVCA

Beyond these compelling legal arguments, imposing a reporting obligation on wireless affiliates of holders would be wholly inconsistent with DIVCA for a variety of additional reasons. First, if collected, such information would be limited to only those few wireless companies affiliated with applicants for a statewide

[17] See, e.g., 7 Witkin Summ. Cal. Law, Const. Law § 125 (omissions from bills), citing *Beverly v. Anderson* (1999) 76 C.A.4th 480, 485, 90 C.R.2d 545 (fact that Legislature omitted provision from final version of statute is strong evidence that it did not intend provision to be judicially grafted onto statute); *see also Rich v. State Board of Optometry,* 235 Cal. App. 2d 591, 607, 45 Cal. Rptr. 512 (1965) ("The rejection by the Legislature of a specific provision contained in an act as originally introduced is ***most persuasive*** to the conclusion that the act should not be construed to include the omitted provision.") (emphasis added); *California Mfrs. Assn. v. Public Utilities Com*. (1979) 24 Cal. 3d 836, 845-846 [157 Cal. Rptr. 676, 598 P.2d 836].) (accord).

franchise, and would omit major carriers such as Sprint, Alltel, and T-Mobile. This would violate DIVCA's express principle of creating "a fair and level playing field . . . that does not disadvantage or advantage one service provider . . . over another."[18] More to the point, however, wireless broadband data *cannot* be reported consistent with DIVCA's wireline-focused provisions – that is, per subscriber, by household, and on a census tract basis.

Verizon Wireless reports broadband availability data to the FCC[19], and posts coverage areas on its website. However, the available data does not comport with DIVCA for the following reasons:

- Rather than being tied to a household, Verizon Wireless broadband service is mobile and can be used anywhere it is available in the U.S. It may be billed to an address where the service is not available, and it can be used at an address or location where it is not billed. Therefore, attempting to determine the number of households that subscribe to, or have wireless broadband available at household locations, as DIVCA requires, would produce meaningless data.

- Broadband users are not tracked as residential or business customers, making availability by "household" inapplicable.

- Based on FCC reporting guidelines, Verizon Wireless counts broadband customers as those whose devices (handsets, palm organizers, aircards, laptops, etc.) are EVDO-capable.[20] These devices can access wireless broadband service wherever service is deployed, but that does not translate to the data sought by DIVCA, since not all customers with these devices subscribe to broadband service, and some customers have multiple devices at the same address.

- Reporting EVDO availability by location will not provide consistent information on availability by census tract. Wireless broadband is subject to transmission limitations, particularly near boundaries and in remote areas. The propagation characteristics of the signal at any given location may vary depending upon the geography of the site, customer equipment,

[18] § 5810 (2)(A).
[19] Verizon Wireless reports broadband availability in each zip code to the FCC, but does not report customer or household counts of subscribers or availability.
[20] EVDO, or Evolution Data Optimized, refers to a wireless radio broadband data standard utilized by Verizon Wireless.

> weather, the buildings in the area, whether the user is indoors or outdoors, and the distance of user from the antenna tower, among other factors.

For all of these reasons, including wireless affiliates in the scope of DIVCA's reporting obligation makes no sense, and would produce meaningless data inconsistent with data reported by those carriers to which DIVCA legitimately extends – wireline carriers. Should the Commission desire comprehensive available wireless broadband data on a zip code basis, it can easily obtain it from the FCC for *all* wireless carriers in California. This would eliminate any need to fit a square peg into a round hole by trying to employ DIVCA for that purpose.

Accordingly, Verizon strongly objects to extension of the broadband reporting requirements to affiliates, particularly wireless affiliates. Any definition of affiliate must either be completely eliminated for broadband reporting purposes, consistent with DIVCA or, at a minimum, be limited to wireline affiliates.

III. APPLICATION REQUIREMENTS

A. A Bond Cannot Issue Without a Franchise Effective Date

DIVCA requires each application to include "adequate assurance" of sufficient qualifications to operate a video service system, adding that "the commission may require a bond" to accomplish these requirements.[21] The PD achieves this by requiring the holder to "provide a copy of its *executed* bond with

[21] § 5840(e)(9). (The PD's citation to DIVCA's bonding requirement, appearing at footnote 259 on p. 76, is incorrect and should be modified.)

its application."[22] However, this requirement to submit an executed bond with the franchise application cannot be accomplished.

In Verizon's experience, financial institutions cannot issue bonds insuring performance for an obligation that does not yet exist. For example, Wachovia Insurance Services, which has issued such instruments for Verizon in the local franchise context, has informed Verizon that it will not issue a bond without a document certifying the effective date of the obligation for which performance is secured.[23] Any incorrect information in the bond application, e.g., an incorrect "guess" as to the effective date of the yet-to be-issued franchise, would invalidate the bond and require its re-issuance. Verizon understands this to be a practice common to the financial services industry.

This problem can be easily rectified by conditioning the holder's ability to provide video service on its posting a bond within a certain period of time, e.g., five business days, from the effective date of the franchise. In this manner, the application can be processed without a fully executed bond.

IV. DATA REPORTING

A. Data Requirement Must Recognize That Census and Company Data Do Not Overlap Perfectly

The PD is correct in stating that "we suspect" that video service providers will combine U.S. Census data and video/broadband availability data to establish compliance with DIVCA's non-discrimination and reporting requirements relating

[22] PD at 76 (emphasis added).

[23] Indeed, this practice is reflected in a number of municipal websites cited in the PD at 73, note 254, indicating that local franchising authorities require bonds or other security instruments within a certain number of days after approval of the franchise agreement, or before beginning construction. See, e.g., http://www.cityofpaloalto.org/cable/franchise-agreement.html#11, and http://www.city.pittsburgh.pa.us/cable/sections_13-16.html#13.5.

to low-income households.[24] Indeed, in Verizon's view, there is no other way to accomplish this result. Telephone companies are not demographers, nor do they survey their customers for income data. The only way to meet the low-income reporting requirements is to use U.S. Census data, updated as required by DIVCA, to assess the low-income build and non-discrimination requirements. Indeed, as the PD recognizes, companies are in a far better position to report data on actual subscriber households (which are in the billing system) as opposed to potential customers.[25]

However, the PD errs in "assuming" that video providers will "offer service only to whole census tracts, rather than portions of census tracts."[26] Verizon offers service in the geographical areas reached by its wirecenters, and the boundaries of wirecenters will frequently bisect census tracts. This issue is easily addressed by assigning households to wirecenters using GIS software, and this footnote should be deleted.

B. The Data Requirements in Appendix E Must Be Clarified

Appendix E provides detailed reporting instructions to calculate household counts in the telephone and video service areas. The calculations of low-income households (Item 3 and 4) should be modified to be consistent with § 5890(j)(2) and the PD at p. 140. Since the number of low-income households in a census tract is benchmarked to January 1, 2007, the number of low-income households (Item 3) must be calculated annually using the percentage of low-income households as of January 1, 2007, multiplied by the number of current-year

---

[24] PD at 136.
[25] Id.
[26] Id. at 136, footnote 501.

households.   Similarly, the calculation of low-income households offered video service (Item 4) must rely on the percentage of low-income households as of January 1, 2007. In addition, this percentage must be calculated using households, as defined by the U.S. Census Bureau, not housing units.[27]

C. Confidentiality of Competitive Data Must Be Preserved

The PD correctly recognized that annual broadband and video services data warrant confidential treatment as required in Public Utilities Code § 583.[28] This is in accord with the FCC's policy of treating Form 477 broadband data as confidential, as it is particularly sensitive for areas experiencing increased competition, as here.[29]

However, the PD errs in its premature "expectation" that aggregated data from all reporting carriers "will not be competitively sensitive."[30] Early reports will include *only* data from competitively vulnerable new market entrants, as incumbent cable providers will not even begin to be covered by the statewide franchise system (and its attendant reporting obligations) until January 2, 2008,[31] and may not be covered until years later as their local franchises expire.[32]

As the FCC has recognized, aggregation supports public release of otherwise confidential data only where the "summary nature" of the submission

---

[27] The U.S Census defines "household" and "housing unit" differently. See http://ask.census.gov/cgi-bin/askcensus.cfg/php/enduser/std_adp.php?p_faqid=322&p_created=1078843804&p_sid=5y7qvuti&p_accessibility=0&p_redirect=&p_lva=&p_sp=cF9zcmNoPTEmcF9zb3J0X2J5PSZwX2dyaWRzb3J0PSZwX3Jvd19jbnQ9ODMmcF9wcm9kcz0mcF9jYXRzPSZwX3B2PSZwX2N2PSZwX3BhZ2U9MSZwX3NlYXJjaF90ZXh0PWhvdXNlaG9sZA**&p_li=&p_topview=1
[28] PD at 138.
[29] *Local Competition and Broadband Reporting*, Report and Order, 15 FCC Rcd 7717 at ¶ 88 and note 226 (2000).
[30] Id.
[31] §5930(b) (no statewide franchise for incumbent cable provider effective before January 2, 2008).
[32] §5840(o)(incumbent may seek statewide franchise upon expiration of local franchise, mutual agreement, or market entry).

"is not likely to cause … substantial competitive injury…."[33] Therefore, no determination as to the confidentiality of "aggregate" data should be made until the data is submitted and the submitting parties have an opportunity to raise any confidentiality concerns at that time, and seek an order of the full Commission regarding confidentiality.

V. ENFORCEMENT OF STATUTORY PROVISIONS

A. The PD's Discussion of "Required Hearings" Conflicts with DIVCA

The PD's lengthy discussion of its enforcement authority under DIVCA is a thorough analysis that generally tracks the statutory limitations. However, in certain places, the analysis reads the statute too broadly and must be corrected.

The PD correctly concludes that, although it may suspend or terminate a franchise for failure to comply with the entire "division" – Division 2.5 of DIVCA[34] – its regulatory and investigatory authority "is not similarly broad."[35] The PD concludes that its investigatory authority is limited to franchising, anti-discrimination, reporting, cross-subsidization, and fees.[36] However, the PD errs in further concluding that its *obligation* to hold hearings is as broad as its investigatory authority. This is incorrect and conflicts with DIVCA.

In reaching this conclusion, the PD misreads § 5890(g), which states:

> (g) Local governments may bring complaints to the state franchising authority that a holder is not offering video service **as required by this section**, or the state franchising authority may **open an investigation** on its own motion. The state franchising

[33] *In the Matter of Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission*, Report and Order, 13 FCC Rcd 24816 at ¶ 53 (1998)(audit data); see also *Local Competition and Broadband Reporting*, Report and Order, 15 FCC Rcd 7717 at ¶ 89 (2000) (broadband data is aggregated "so that it does not identify the individual provider in our regularly published reports.")
[34] PD at 162, citing § 5890(g).
[35] PD at 162-163.
[36] PD at 163. This conclusion is discussed in greater detail below in section V.B.

> authority shall hold public hearings before issuing a decision. The commission may suspend or revoke the franchise if the holder fails to comply with the provisions of this division. (emphasis added)

The PD errs in stating that "§ 5890(g) does not specify whether the requirement to 'hold public hearings before issuing a decision' applies to matters raised pursuant to a division or particular sections."[37] This view ignores the plain language of § 5890(g) and a long-standing rule of statutory interpretation, *noscitur a sociis*: "a word takes meaning from the company it keeps." Under this canon, "the meaning of a word may be ascertained by reference to the meaning of other terms which the Legislature has associated with it in the statute, and ... its scope may be enlarged or restricted to accord with those terms."[38] Here, the reference to a "decision" follows *immediately* after the sentence that allows local governments to complain, or the Commission to investigate, allegations "that a holder is not offering video service ***as required by this section***."[39] Accordingly, a plain reading of these two sentences together shows that the "decision" and its attendant requirement of a "hearing" refer to the determination whether the holder has violated *that section* (i.e., § 5890), not DIVCA as a whole.

Indeed, this interpretation is consistent with DIVCA's limited references to hearings. Under express DIVCA provisions, the Commission *must* hold hearings in *only* two instances: (1) if a holder requests an extension of time to meet its non-discrimination or build obligations,[40] and (2) before issuing a decision

---

[37] PD at 164.
[38] *People v. Rogers* 5 Cal.3d 129, 142, 95 Cal. Rptr. 601, 486 P.2d 129 (1971) (conc. & dis. opn. of Mosk). See also *Oden v. Board of Administration* 23 Cal. App. 4th 194, 203, 28 Cal. Rptr. 2d 388) (1994) ("A word of uncertain meaning may be known from its associates and its meaning 'enlarged or restrained by reference to the object of the whole clause in which it is used.')
[39] § 5890(g)(emphasis added).
[40] § 5890(f)(2)(the Commission "shall hold public hearings in the telephone service area of the applicant" for an extension).

regarding a violation of §5890 pursuant to a complaint by local government or investigation on the Commission's own motion.[41] Thus, the Commission is *required* to hold hearings *only* to resolve extension requests or alleged violations involving § 5890,[42] *not* whenever franchising, anti-discrimination and build-out, reporting, cross-subsidization, or user fee provisions are at issue, as the PD reasons.[43] Such a requirement also violates other sections of the Public Utilities Code that expressly give the Commission discretion to determine whether and when to hold hearings, consistent with due process, public policy and statutory requirements, and gives parties the right to challenge those determinations.[44] In addition, and somewhat ironically, such a requirement contravenes established Commission practice involving more heavily-regulated utilities. The Commission does *not* hold public hearings in every investigation, and doing so would clearly grind the business of the Commission to a screeching halt.

Finally, the PD relies on this overbroad reading of §5890 as support for requiring hearings in connection with each area in which the PD determined that the Commission has investigatory authority. [45] References to required hearings must be eliminated in those sections as well as in Appendix H (Enforcement Action Pursuant to DIVCA).

---

[41] § 5890(g)(the Commission "shall hold public hearings" before issuing a decision)
[42] The PD's conclusion that hearings are required is erroneous, as discussed in the text; however, nothing in DIVCA precludes the Commission from exercising its *discretion* to hold hearings within the proper scope of its authority. Indeed, DIVCA confirms that the Commission retains such discretion. See § 5810(2)(G)(DIVCA adheres to the principle that the Commission "[maintains] all existing authority . . . as established in state and federal statutes.")
[43] PD at 164.
[44] See Public Utilities Code § 1701.1(a): "The commission, consistent with due process, public policy, and statutory requirements, shall determine whether a proceeding requires a hearing."
[45] See PD at 166 and note 581 (franchising); 170 and note 594(reporting); 178 and note 618 (cross-subsidization); and 179 and note 622 (user fees).

B. The PD Cannot Rely on Section 5890(g) to Define Its Investigative Authority

To the extent that the PD relies on § 5890(g) to define the scope of its investigative authority, such reliance is both misplaced and unnecessary. It is misplaced because, as discussed above, § 5890(g) is part of, and relates solely to, the non-discrimination provisions of DIVCA, and cannot serve as the basis for determining the proper scope of the Commission's investigative authority for DIVCA as a whole. It is unnecessary because a plain reading of DIVCA dictates the Commission's investigative authority.

As the PD notes, the Commission is entitled to regulate in limited areas: franchising, anti-discrimination, reporting, cross-subsidization, and fees.[46] The PD need not examine further whether the Commission's investigative authority mirrors the scope of its authority to regulate. Clearly DIVCA contemplates that the Commission may investigate before regulating; see, e.g., Public Utilities Code § 401 ("The Legislature finds and declares that the public interest is best served by a commission that . . . can thoroughly examine the issues before it . . . "); and § 5810 (2)(G) (DIVCA should "[m]aintain all existing authority of the California Public Utilities Commission as established in state and federal statutes."). It stands to reason that the authority to regulate an area carries with it the obligation to do so in an informed manner, and therefore includes the authority to investigate with respect to the regulated area.[47] Accordingly, the

[46] PD at 163.
[47] See *Dow Chemical v. United States*, 476 U.S. 227; 106 S. Ct. 1819 (1986)("Common sense and human experience" indicate that "[r]regulatory or enforcement authority generally carries with it all the modes of inquiry and investigation traditionally employed or useful to execute the authority granted.")

PD's strained reading of § 5890(g) is apposite and the PD should not rely on it for this purpose.

C. The Commission Should Have Full Discretion to Determine the Appropriate Type of Hearing in Any Future Proceeding

Similarly, although the PD is correct that DIVCA "does not define" the type of hearing required, it does provide a modicum of guidance. Requests for extensions of time require a public hearing "in the telephone service area of the applicant,"[48] which would most reasonably be read to mean a public participation hearing. In other instances, the PD's determination that the Commission may exercise its discretion to determine which type of public hearing will best develop the record for the particular issue at hand[49] is reasonable.

However, the PD errs in eliminating a quasi-legislative hearing as an available option.[50] While this may *now* seem the least likely type of hearing to be used, no reason exists to prematurely tie the hands of future commissions in selecting the best hearing tool to address the issues and circumstances present at that time, particularly when such a limitation violates Public Utilities Code §1701.1.[51] By the same token, the PD's conclusion that any investigation into franchising provisions would be conducted as an adjudicatory matter[52] is likewise unnecessary, premature and violates the statutory discretion conferred by §1701.1. The Commission has well-established rules and procedures for

---

[48] § 5890(f)(2).
[49] PD at 164-165.
[50] PD at 165, note 579.
[51] See § 1701.1(a) which provides in part: "The commission shall determine whether the matter requires a quasi-legislative, and adjudication, or a ratesetting hearing. The commission's decision as to the nature of the proceeding shall be subject to a request for rehearing within 10 days of the date of that decision."
[52] PD at 166.

categorizing proceedings, and those should continue to apply at the time an investigation is opened to determine how a particular case should be handled.[53]

VI. RECOMMENDED CHANGES TO THE PROPOSED GENERAL ORDER

In addition to the above general comments, Verizon proposes red-lined changes to the General Order as well as the findings of fact and conclusions of law set forth in Exhibit 2. Because the General Order is the operative document governing implementation of DIVCA, its provisions are critical. In addition to changes to conform to the recommendations made above, Verizon's recommended changes by section are summarized and itemized in the attached appendices for convenience. These include:

- Conforming language to that contained in DIVCA (e.g., with regard to definitions, cross subsidization, etc.)
- Permitting delivery of the application to affected municipalities to be accomplished through any means of "service" as provided in the Commission's Rules of Practice and Procedure, including electronic service
- Providing that, in the event of conflict between the General Order and DIVCA, the latter controls

VII. CONCLUSION

Verizon commends the Commission for its diligent attention to the requirements of DIVCA in developing these implementing rules and procedures. However, for all the foregoing reasons, the additional changes recommended in these comments should be made in order to more closely conform the

[53] Indeed, should any doubt remain, the applicability of these categorization rules can be deferred to Phase II, which is scheduled to address the applicability of the Commission's Rules of Practice and Procedure to DIVCA proceedings.

Commission's rules to DIVCA and to bring the benefits of video competition to California in the streamlined manner that the Legislature intended.

Finally, Verizon respectfully requests that the Commission vote out the final decision in this proceeding promptly as scheduled on February 15. This will enable tens of thousands of customers in Verizon's anticipated video service territory to have the option of true video service competition as soon as the state-issued franchise can be submitted and approved.

Dated: February 5, 2007

Respectfully submitted,

By: Elaine M. Duncan

ELAINE M. DUNCAN

Attorney for Verizon California Inc.
711 Van Ness Avenue, Suite 300
Tel: 415-474-0468
Fax: 415-474-6546
San Francisco, CA 94102
E-mail: Elaine.duncan@verizon.com

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Ave., Ste. 300, San Francisco, CA 94102; I have this day served a copy of the foregoing:

OPENING COMMENTS OF VERIZON CALIFORNIA INC. ON PROPOSED DECISION OF COMMISSIONER CHONG

by electronic mail to those parties on the service list shown below who have supplied an e-mail address, and by U.S. mail to all other parties on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of February, 2007, at San Francisco, California.

/s/Sonja Killingsworth
SONJA KILLINGSWORTH

Service List:
Rulemaking 06-10-005

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0610005 - CPUC - CABLE TELEVIS
Filer: CPUC - CABLE TELEVISION
List Name: INITIALLIST
Last changed: January 16, 2007

Download the Comma-delimited File
About Comma-delimited Files

Back to Service Lists Index

Appearance

WILLIAM H. WEBER
ATTORNEY AT LAW
CBEYOND COMMUNICATIONS
320 INTERSTATE NORTH PARKWAY
ATLANTA, GA 30339

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

DAVID C. RODRIGUEZ
STRATEGIC COUNSEL
523 WEST SIXTH STREET, SUITE 1128
LOS ANGELES, CA 90014

MAGGLE HEALY
CITY OF REDONDO BEACH
415 DIAMOND STREET
REDONDO BEACH, CA 90277

GERALD R. MILLER
CITY OF LONG BEACH
333 WEST OCEAN BLVD.
LONG BEACH, CA 90802

TRACEY L. HAUSE
ADMINISTRATIVE SERVICES DIRECTOR
CITY OF ARCADIA
240 W. HUNTINGTON DRIVE
ARCADIA, CA 91007

CYNTHIA J. KURTZ
CITY MANAGER
CITY OF PASADENA
117 E. COLORADO BLVD., 6TH FLOOR
PASADENA, CA 91105

ROB WISHNER
CITY OF WALNUT
21201 LA PUENTE ROAD
WALNUT, CA 91789

BARRY FRASER
CABLE FRANCHISE ADMINISTRATOR
COUNTY OF SAN DIEGO

ESTHER NORTHRUP
COX CALIFORNIA TELCOM, LLC
5159 FEDERAL BLVD.

1600 PACIFIC HIGHWAY, ROOM 208
SAN DIEGO, CA 92101

SAN DIEGO, CA 92105

KIMBERLY M. KIRBY
ATTORNEY AT LAW
MEDIASPORTSCOM P.C.
3 PARK PLAZA, SUITE 1650
IRVINE, CA 92614

BILL NUSBAUM
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
ATTORNEY AT LAW
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

IZETTA C.R. JACKSON
OFFICE OF THE CITY ATTORNEY
CITY OF OAKLAND
1 FRANK H. OGAWA PLAZA, 10TH FLR.
OAKLAND, CA 94103

DAVID J. MILLER
ATTORNEY AT LAW
AT&T CALIFORNIA
ROOM 2018
525 MARKET STREET
SAN FRANCISCO, CA 94105

FASSIL FENIKILE
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1925
SAN FRANCISCO, CA 94105

SYREETA GIBBS
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR
SAN FRANCISCO, CA 94105

TOM SELHORST
AT&T CALIFORNIA
525 MARKET STREET, 2023
SAN FRANCISCO, CA 94105

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

WILLIAM L. LOWERY
MILLER VAN EATON, LLP
400 MONTGOMERY STREET, SUITE 501
SAN FRANCISCO, CA 94121

ALLEN S. HAMMOND, IV
PROFESSOR OF LAW
SANTA CLARA UNIVERSITY SHCOOL OF LAW
500 EL CAMINO REAL
SANTA CLARA, CA 94305

JOSEPH S. FABER
ATTORNEY AT LAW
LAW OFFICE OF JOSEPH S. FABER
3527 MT. DIABLO BLVD., SUITE 287
LAFAYETTE, CA 94549

DOUGLAS GARRETT
COX COMMUNICATIONS
2200 POWELL STREET, STE. 1035
EMERYVILLE, CA 94608

GLENN SEMOW
DIRECTOR STATE REGULATORY & LEGAL AFFAIR
CALIFORNIA CABLE & TELECOMMNICATIONS
360 22ND STREET, NO. 750
OAKLAND, CA 94612

JEFFREY SINSHEIMER
CALIFORNIA CABLE & TELECOMMUNICATIONS
360 22ND STREET, 750
OAKLAND, CA 94612

LESLA LEHTONEN
VP LEGAL & REGULATORY AFFAIRS
CALIFORNIA CABLE TELEVISION ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MARIA POLITZER
LEGAL DEPARTMENT ASSOCIATE
CALIFORNIA CABLE TELEVISION ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MARK RUTLEDGE
TELECOMMUNICATIONS FELLOW
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLR.
BERKELEY, CA 94704

PHILIP KAMLARZ
CITY OF BERKELEY
2180 MILVIA STREET
BERKELEY, CA 94704

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

ALEXIS K. WODTKE
ATTORNEY AT LAW
CONSUMER FEDERATION OF CALIFORNIA (CFC)
520 S. EL CAMINO REAL, STE. 340
SAN MATEO, CA 94941

WILLIAM HUGHES
ASSISTANT CITY ATTORNEY
CITY OF SAN JOSE
16TH FLOOR
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113-1900

GREG R. GIERCZAK
EXECUTIVE DIRECTOR
SURE WEST TELEPHONE
PO BOX 969
200 VERNON STREET
ROSEVILLE, CA 95678

PATRICK WHITNELL
LEAGUE OF CALIFORNIA CITIES
1400 K STREET
SACRAMENTO, CA 95814

MARIE C. MALLIETT
THE COMMUNICATIONS WORKERS OF AMERICA
2870 GATEWAY OAKS DRIVE, SUITE 100
SACRAMENTO, CA 95833-3509

Information Only

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
CITIZENS/FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

ALOA STEVENS
DIRECTOR, GOVERNMENT&EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 708970
SANDY, UT 84070-8970

KEN SIMMONS
ACTING GENERAL MANAGER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1400
200 N. MAIN STREET
LOS ANGELES, CA 90012

LONNIE ELDRIDGE
DEPUTY CITY ATTORNEY
CITY ATTORNEY'S OFFICE
CITY HALL EAST, SUITE 700
200 N. MAIN STREET
LOS ANGELES, CA 90012

RICHARD CHABRAN
CALIFORNIA COMMUNITY TECHNOLOGY POLICY
1000 ALAMEDA STREET, SUITE 240
LOS ANGELES, CA 90012

ROY MORALES
CHIEF LEGISLATIVE ANALYST
CIYT OF LOS ANGELES
CITY HALL
200 N. SPRING STREET, 2ND FLOOR
LOS ANGELES, CA 90012

STACY BURNETTE
ACTING CABLE TELEVISION DIV. MANAGER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1255
200 N. MAIN STREET
LOS ANGELES, CA 90012

WILLIAM IMPERIAL
TELECOMMUNICATIONS REG. OFFICER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1255
200 N. MAIN STREET
LOS ANGELES, CA 90012

GREG FUENTES
11041 SANTA MONICA BLVD., NO.629
LOS ANGELES, CA 90025

JONATHAN L. KRAMER
ATTORNEY AT LAW
KRAMER TELECOM LAW FIRM
2001 S. BARRINGTON AVE., SUITE 306
LOS ANGELES, CA 90025

MICHAEL J. FRIEDMAN
VICE PRESIDENT
TELECOMMUNICATIONS MANAGEMENT CORP.
5757 WILSHIRE BLVD., SUITE 645
LOS ANGELES, CA 90036

STEVEN LASTOMIRSKY
DEPUTY CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO, CA 92101

SUSAN WILSON
DEPUTY CITY ATTORNEY
RIVERSIDE CITY ATTORNEY'S OFFICE
3900 MAIN STREET, 5TH FLOOR
RIVERSIDE, CA 92522

AARON C. HARP
OFFICE OF THE CITY ATTORNEY
CITY OF NEWPORT BEACH
3300 NEWPORT BLVD
NEWPORT BEACH, CA 92658-8915

BOB WILSON
300 N. FLOWER STREET, 813
SANTA ANA, CA 92703-5000

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350

SAN FRANCISCO, CA 94102

WILLIAM K. SANDERS
DEPUTY CITY ATTORNEY
OFFICE OF THE CITY ATTORNEY
1 DR. CARLTON B. GOODLETT PLACE,ROOM 234
SAN FRANCISCO, CA 94102-4682

JEFFREY LO
ASIAN LAW CAUCUS
939 MARKET STREET, SUITE 201
SAN FRANCISCO, CA 94103

MALCOLM YEUNG
STAFF ATTORNEY
ASIAN LAW CAUCUS
939 MARKET ST., SUITE 201
SAN FRANCISCO, CA 94103

RANDLOPH W. DEUTSCH
SIDLEY AUSTIN LLP
555 CALIFORNIA STREET, SUITE 2000
SAN FRANCISCO, CA 94104

GREG STEPHANICICH
RICHARDS, WATSON & GERSHON
44 MONTGOMERY STREET, SUITE 3800
SAN FRANCISCO, CA 94104-4811

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

PETER A. CASCIATO
A PROFESSIONAL CORPORATION
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

NOEL GIELEGHEM
COOPER, WHITE & COOPER LLP
201 CALIFORNIA ST. 17TH FLOOR
SAN FRANCISCO, CA 94111

JOSE E. GUZMAN, JR.
NOSSAMAN GUTHNER KNOX & ELLIOTT LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

GRANT GUERRA
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

WILLIAM L. LOWERY
MILLER VAN EATON, LLP
400 MONTGOMERY STREET, SUITE 501
SAN FRANCISCO, CA 94121

GRANT KOLLING
SENIOR ASSISTANT CITY ATTORNEY
CITY OF PALO ALTO
250 HAMILTON AVENUE, 8TH FLOOR
PALO ALTO, CA 94301

DAVID HANKIN
VP, GOVERNMENT AFFAIRS
RCN CORPORATION
1400 FASHION ISLAND BLVD., SUITE 100
SAN MATEO, CA 94404

MARK T. BOEHME
ASSISTANT CITY ATTORNEY
CITY OF CONCORD
1950 PARKSIDE DRIVE
CONCORD, CA 94510

PETER DRAGOVICH
ASSISTANT TO THE CITY MANAGER
CITY OF CONCORD
1950 PARKSIDE DRIVE, MS 01/A
CONCORD, CA 94519

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

SCOTT MCKOWN
C/O CONT OF MARIN ISTD
MARIN TELECOMMUNICATION AGENCY
371 BEL MARIN KEYS BOULEVARD
NOVATO, CA 94941

BARRY F. MCCARTHY, ESQ.
ATTORNEY AT LAW
MCCARTHY & BARRY LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

TIM HOLDEN
SIERRA NEVADA COMMUNICATIONS
PO BOX 281
STANDARD, CA 95373

CHARLES BORN
MANAGER, GOVERNMENT & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS OF CALIFORNIA
9260 E. STOCKTON BLVD.
ELK GROVE, CA 95624

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

KELLY E. BOYD
NOSSAMAN,GUTHNER,KNOX AND ELLIOTT
915 L STREET, SUITE 1000
SACRAMENTO, CA 95814

ROBERT A. RYAN
COUNTY COUNSEL
COUNTY OF SACRAMENTO
700 H STREET, SUITE 2650
SACRAMENTO, CA 95814

SUE BUSKE
THE BUSKE GROUP
3001 J STREET, SUITE 201
SACRAMENTO, CA 95816

State Service

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE NEVILLE
CALIF PUBLIC UTILITIES COMMISSION
CARRIER BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

APRIL MULQUEEN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JENNIE CHANDRA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5141
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSEPH WANZALA
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL OCHOA
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT LEHMAN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5204
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DELANEY HUNTER
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

EDWARD RANDOLPH
CHIEF CONSULTANT
ASSEMBLY COMMITTEE/UTILITIES AND COMMERC
STATE CAPITOL
SACRAMENTO, CA 95814

RANDY CHINN
SENATE ENERGY UTILITIES & COMMUNICATIONS
STATE CAPITOL, ROOM 4040
SACRAMENTO, CA 95814

Top of Page
Back to INDEX OF SERVICE LISTS